

# HURT, CROSBIE & MAY PLLC

William C. Hurt, Jr.  
Scott A. Crosbie  
William H. May, III  
Michael D. Kalinyak  
Steven Lenarz  
Matthew R. Malone  
Aaron D. Reedy  
James L. Deckard  
Jacob K. Michul

THE EQUUS BUILDING  
127 WEST MAIN STREET  
LEXINGTON, KENTUCKY 40507

Telephone - (859) 254-0000  
Facsimile - (859) 254-4763

Jennifer S. Scutchfield \*

\* Of Counsel

RECEIVED

MAY 28 2010

PUBLIC SERVICE  
COMMISSION

May 28, 2010

*Via Hand-Delivery*

Mr. Jeff Derouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RE: *Case No. 2010-00146; An Investigation of Natural Gas Retail Competition Programs*

Dear Mr. Derouen:

Please find enclosed the original and twelve (12) copies of Interstate Gas Supply Inc.'s, SouthStar Energy Services, LLC's and Vectren Source's collective motion to intervene in the above-referenced case.

Please place the document of file.

Regards,



Matthew Malone

C: File; Parties

RECEIVED

MAY 28 2010

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of: : CASE NO. 2010-00146

AN INVESTIGATION OF NATURAL :  
GAS RETAIL COMPETITION PROGRAMS :

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**INTERSTATE GAS SUPPLY, INC.'S, SOUTHSTAR ENERGY SERVICES, LLC'S AND  
VECTREN SOURCE'S MOTION TO INTERVENE**

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Comes Interstate Gas Supply, Inc. ("IGS"), SouthStar Energy Services, LLC ("SouthStar") and Vectren Retail, LLC d/b/a Vectren Source ("Vectren"), individually, and hereinafter, collectively (the "Marketers") pursuant to 807 KAR 5:001 Section 3(8), by counsel, and move for full intervenor status in this action to the fullest extent permitted by law, on behalf of themselves and those consumers and potential consumers that they do or would serve through the Small Volume Gas Transportation Service ("Choice Program"). In support of this Motion, the Marketers states as follows:

In this matter, the Commission will examine natural gas retail competition programs to determine if benefits could be derived from these programs, and to determine whether these programs could be crafted to benefit Kentucky consumers. The Marketers referenced above have retained undersigned counsel to represent them collectively in these proceedings. Each Marketer's individual application herein for intervention should stand on its own merits but to avoid filing numerous motions to intervene a single document format was chosen.

**I. IGS.**

With respect to IGS, IGS is a supplier in the Choice Program and supplies tens of thousands of natural gas customers at the residential and small commercial customer level through the Choice Program in the Kentucky Columbia Gas territory.

IGS is the largest competitive supplier in the Choice Program. IGS currently supplies natural gas to over 26,000 Columbia territory customers. IGS operates in seven states and fourteen different utility markets serving approximately 800,000 customers collectively.

The application proposed by the Commission involves continuation and investigation of the Choice Program and, as such, will directly impact IGS, current Choice Program customers, and future Choice Program customers. Accordingly, IGS has a special interest in this proceeding which is not otherwise adequately represented and IGS will present issues and develop facts that will be helpful to the Commission in fully hearing this matter in regards to the benefits of properly structured choice programs including its knowledge of the Columbia Choice Program, and participation by IGS will not unduly delay these proceedings, or unduly complicate or disrupt them.

## **II. SouthStar.**

With respect to SouthStar, SouthStar is a natural gas marketer serving approximately 500,000 residential, commercial and industrial customers throughout Georgia. SouthStar is headquartered in Georgia with its principal address being 817 W. Peachtree Street, Suite 1000, Atlanta, Georgia 30308. SouthStar also serves retail customers in Ohio, Florida, North Carolina, South Carolina and Tennessee. SouthStar has been in existence since 1998.

SouthStar has significant institutional knowledge regarding choice programs based on its involvement in other state utility markets and effects related thereto as it pertains to natural gas marketers and the potential benefits of properly structured choice programs for consumers. SouthStar has previously intervened in utility rate adjustment matters before other commissions in other jurisdictions. The current sunset provisions of the Columbia Choice program (May 2012) have hindered SouthStar's desire to involve itself in the available Kentucky Choice

Program to this point but expansion of Kentucky utility choice programs and the case at bar is of great interest to SouthStar. Full intervention by SouthStar will likely present issues and develop facts, especially given its current involvement in, experience and knowledge of other utility choice programs in several other jurisdictions, that will be helpful to the Commission in fully hearing this matter to determine the benefits of a properly structured choice program, and participation by SouthStar will not unduly delay these proceedings, or unduly complicate or disrupt them.

### **III. Vectren.**

With respect to Vectren, Vectren is a natural gas marketer serving residential and small commercial consumers in the Midwest and the Northeast United States. Vectren participates in utility choice programs in Indiana, Ohio and New York. Vectren is headquartered in Indiana with its principal address being One Vectren Square, 211 NW Riverside Drive, Evansville, Indiana 47708. Vectren serves nearly 200,000 choice consumers within Indiana, Ohio and New York. Vectren has been in existence since 2001.

Vectren has significant institutional knowledge regarding choice programs based on its involvement in other state utility markets and effects related thereto as it pertains to natural gas marketers and the potential benefits of properly structured choice programs for consumers. Vectren has previously intervened in utility rate adjustment matters before other Commissions in other jurisdictions. The current sunset provisions of the Choice Program (May 2012) have hindered Vectren's desire to involve itself in the available Kentucky Choice Program to this point but expansion of Kentucky utility choice programs and the case at bar is of great interest to Vectren. Full intervention by Vectren will likely present issues and develop facts, especially given its current involvement in, experience and knowledge of other utility choice programs in

several other jurisdictions, that will be helpful to the Commission in fully hearing this matter to determine the benefits of properly structured Choice programs, and participation by Vectren will not unduly delay these proceedings, or unduly complicate or disrupt them.

**Wherefore**, the Marketers, IGS, SouthStar and Vectren, individually and collectively, respectfully request for the reasons stated above that they be permitted to fully intervene in the above-referenced matter.

Respectfully submitted,

HURT, CROSBIE & MAY PLLC



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William H. May, III  
Matthew R. Malone  
The Equus Building  
127 West Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (office)  
(859) 254-4763 (facsimile)

Counsel for the Marketers,  
**INTERSTATE GAS SUPPLY, INC.**  
**SOUTHSTAR ENERGY SERVICES, LLC**  
**and**  
**VECTREN RETAIL, LLC D/B/A**  
**VECTREN SOURCE**

**CERTIFICATE OF SERVICE**

I hereby certify that an original and twelve (12) copies of this Motion to Intervene were served via hand-delivery upon Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail, postage prepaid, on the following, all on this 28 day of May, 2010.

Lonnie E Bellar  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

Tom Fitzgerald, Esq.  
Liz D. Edmondson, Esq.  
Kentucky Resources Council, Inc.  
P.O. Box 1070  
Frankfort, KY 40602

John B Brown  
Delta Natural Gas Company, Inc.  
36 17 Lexington Road  
Winchester, KY 40391

Judy Cooper  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

Rocco D'Ascenzo, Esq.  
Duke Energy Kentucky, Inc.  
139 East 4th Street, R.25 At II  
P. O. Box 960  
Cincinnati, OH 45201

John M Dosker, Esq.  
Stand Energy Corporation  
1077 Celestial Street  
Building 3, Suite 110  
Cincinnati, OH 45202-1629

Brooke E Leslie, Esq.  
Columbia Gas of Kentucky, Inc.  
200 Civic Center Drive  
P.O. Box 117  
Columb11s, OH 43216-0117

Mark Martin  
Atmos Energy Corporation  
3275 Highland Pointe Drive  
Owensboro, KY 42303

Iris G Skidmore, Esq.  
4 15 W. Main Street, Suite 2  
Frankfort, Kentucky 4060 1

A handwritten signature in black ink, appearing to read 'Matthew R. Malone', written in a cursive style.

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MATTHEW R. MALONE